IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Amanda Teresa Saucier, Debtor Case No. 25-50108-KMS
CHAPTER 13

NOTICE

Debtor has filed papers with the court to Modify their Chapter 13 Bankruptcy Plan.

<u>Your rights may be affected.</u> You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to amend the Plan, or if you want the court to consider your views on the Motion, then on or before 30 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk U.S. Bankruptcy Court Thad Cochran United States Courthouse 501 E. Court St., Ste 2.300 Jackson, MS 39201

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date state above.

You must also mail a copy to the debtors' attorney:

The Rollins Law Firm, PLLC P.O. Box 13767 Jackson, MS 39236 (601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief, which shall sustain this Motion to Modify Plan.

Date: April 15, 2025 Signature: /s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469) Jennifer Ann Curry Calvillo (MSBN 104367)

The Rollins Law Firm, PLLC

P.O. Box 13767 Jackson, MS 39236

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Amanda Teresa Saucier, Debtor

Case No. 25-50108-KMS
CHAPTER 13

MOTION TO MODIFY BANKRUPTCY PLAN

COMES NOW, Debtor, by and through counsel, and moves this Court to modify their Chapter 13 plan, and in support thereof, would show the Court as follows:

- 1. Debtor commenced this case on January 27, 2025 by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
- 2. Debtor requests that the plan payment be recalculated and reduced to pay only those claims that were timely filed.
- Debtor wishes for the Trustee to cure any deficiency including ongoing mortgage
 payments paid through the plan, if one exists, and adjust the wage order as
 needed.

WHEREFORE, Debtor prays that their Bankruptcy Plan be modified to reflect the abovementioned changes and for such additional or alternative relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr. Thomas C. Rollins, Jr. (MS Bar No. 103469)

Of Counsel: Thomas C. Rollins, Jr. Jennifer Ann Curry Calvillo The Rollins Law Firm, PLLC P.O Box 13767 Jackson, MS 39236

601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice and Motion to Modify Plan was forwarded on April 16, 2025, to:

By Electronic CM/ECF Notice:

David Rawlings

U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

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4	UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF MISSISSIPPI		
5			
6	6	E NO: 25-50108 CLARATION OF MAILING	
7	7 CEF	RTIFICATE OF SERVICE	
8		oter: 13	
9	9		
10	0		
11	On 4/16/2025, I did cause a copy of the following documents, described below,		
12	Notice and Motion to Modify Plan		
13	3		
14			
15	5		
16			
17	7		
18	to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein. I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice. com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.		
19			
20			
21			
22	Parties who are participants in the Courts Electronic Noticing Sys	Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system. DATED: 4/16/2025	
23	DATED: 4/16/2025		
24	Thomas C. Rollin		
25	The Rollins Law	The Rollins Law Firm	
26	Hattiesburg, MS		
27	trollins@therollin	sfirm.com	
28	28		

25-50108-KMS Dkt 21 Filed 04/16/25 Entered 04/16/25 10:48:56 Page 4 of 6

	25-50108-KMS Dkt 21 Filed 04/16/25 Entered 04/16/25 10:48:56 Page 5 of 6		
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3	LINUTED OTATEO DANIKOLIDTOV COLIDT		
4	UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF MISSISSIPPI		
5	IN RE: CASE NO: 25-50108		
6	AMANDA TERESA SAUCIER CERTIFICATE OF SERVICE		
7	DECLARATION OF MAILING Chapter: 13		
8			
9			
10			
11	On 4/16/2025, a copy of the following documents, described below,		
12	Notice and Motion to Modify Plan		
13	3		
14	↓		
15			
16			
17			
18			
19	postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth		
20	The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above		
21 22	referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.		
23	DATED: 4/16/2025		
24			
25	Will hall		
26	Miles Wood BK Attorney Services, LLC		
27	d/b/a certificateofservice.com, for Thomas C. Rollins, Jr.		
28	The Rollins Law Firm 702 West Pine St		
	Hattiesburg, MS 39401		

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USPS FIRST CLASS MAILING RECIPIENTS:
Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING NCRS ADDRESS DOWNLOAD CASE 25-50108 SOUTHERN DISTRICT OF MISSISSIPPI WED APR 16 7-13-32 PST 2025

EXCLUDE

US BANKRUPTCY COURT DAN M RUSSELL JR US COURTHOUS: 2012 15TH STREET SUITE 244 GULFPORT MS 39501-2036 1ST FRANKLIN 6335 US HWY 49 STE 20 HATTIESBURG MS 39401

1ST FRANKLIN FINANCIAL CORPORATION ATTN ADMIN SERVICES PO BOX 880 TOCCOA GA 30577-0880 ARS COLLECTION PO BOX 321472 FLOWOOD MS 39232-1472 CC BANK PO BOX 36454 CINCINNATI OH 45236-0454

CHECK N GO ATTN BANKRUPTCY PO BOX 36454 CINCINNATI OH 45236-0454 COMENITY BANK
ATTN BANKRUPTCY
PO BOX 182125
COLUMBUS OH 43218-2125

DEPARTMENT OF TREASURY INTERNAL REVENUE SE INTERNAL REVENUE SERVICE PO BOX 7346 PHILADELPHIA PA 19101-7346

FORREST GENERAL HOSP 6051 MS HWY 49 HATTIESBURG MS 39401 HATTIESBURG CLINIC 415 SOUTH 28TH AVE HATTIESBURG MS 39401-7283 INTERNAL REVENUE SERVI CO US ATTORNEY 501 EAST COURT ST STE 4430 JACKSON MS 39201-5025

KEESLER FEDERAL CREDIT UNION PO BOX 7001 BILOXI MS 39534-7001 MIDLAND CREDIT MANAGEMENT INC PO BOX 2037 WARREN MI 48090-2037

THE FIRST BANK P O BOX 15549 HATTIESBURG MS 39404-5549

US ATTORNEY GENERAL
US DEPT OF JUSTICE
950 PENNSYLVANIA AVENW
WASHINGTON DC 20530-0001

UNITED STATES TRUSTEE
501 EAST COURT STREET
SUITE 6-430

DEBTOR

AMANDA TERESA SAUCIER

43 DIXIE OAKS RD

HATTIESBURG MS 39401-9327

EXCLUDE

(P) DAVID RAWLINGS
ATTN DAVID RAWLINGS CHAPTER 13 TRUSTED
PO BOX 566
HATTIESBURG MS 39403-0566

XCLUDE

THOMAS CARL ROLLINS JR
THE ROLLINS LAW FIRM PLLG
PO BOX 13767
JACKSON MS 39236-3767